

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MICHAEL CASELMAN,)
Plaintiff,)
v.)
GEORGIA-PACIFIC GYPSUM LLC,)
Defendant.)
Case No. 4:14-CV-01338-CAS

JOINT MOTION TO AMEND THE CASE MANAGEMENT ORDER

Plaintiff Michael Caselman and Defendant Georgia-Pacific Gypsum LLC, by and through undersigned counsel, jointly move the Court to amend the Court's Case Management Order (Dkt. #10) as follows: (1) an extension of the deadlines for the completion of discovery and pretrial discovery disputes until September 15, 2015; and (2) an extension of the deadlines for dispositive motions, responses, and replies until September 30, 2015, October 30, 2015, and November 14, 2015, respectively. In support of this motion, the parties state:

1. The Court issued its Case Management Order on August 27, 2014, establishing, *inter alia*, deadlines for the completion of discovery, pretrial discovery disputes, and a filing and briefing schedule for dispositive motions.

2. Despite their diligence, and due to workloads and conflicting schedules, the parties were unable to schedule the mediation of this case until August 4, 2015, when the parties will mediate the case in St. Louis with Jerome Diekemper.

3. In the spirit of Rule 1 of the Federal Rules of Civil Procedure, the parties' agreed to mediate the case prior to completing discovery with the goal that – if the case settles at mediation – the parties would be spared incurring the time, trouble, and expense of taking

additional discovery needed in this case. *See* FED. R. CIV. P. 1 (Federal rules “should be construed and administered to secure the just, speedy, and inexpensive determination of every action and proceeding”). Accordingly, the parties seek to extend the discovery deadline until September 15, 2015, so that they have sufficient time after the August 4, 2015 mediation (if the mediation does not resolve the case) to take depositions of key witnesses and other discovery prior to the dispositive motion deadline.

4. The parties also request that the pretrial discovery dispute deadline be set for September 15, 2015.

5. In conjunction with the discovery extension, the parties respectfully request that the Court extend dispositive motion deadline (which is currently set for the July 20, 2015). The parties propose the following schedule for the filing and briefing of dispositive motions:

- Dispositive motion deadline: September 30, 2015.
- Response deadline: October 30, 2015.
- Reply deadline: November 14, 2015.

6. All remaining deadlines will remain the same.

WHEREFORE, the parties seek (1) an extension of the discovery and pretrial discovery dispute deadlines until September 15, 2015; and (2) an extension of the dispositive motion, response, and reply deadlines until September 30, 2015, October 30, 2015, and November 14, 2015, respectively.

Respectfully submitted,

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